

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,

Plaintiff,

v.

BORIS MIZHEN, MEDIA NETWORK,
INC., NEW AGE OPT-IN, INC., I-
PERMISSION, INC., DMITRI
KOVALSKY, MUHAMMAD MOHSAN-
UL MOULA, ESOLUTIONS
TECHNOLOGY, INC., DECAPTCHER
and JOHN DOES 1 through 20.

Defendants.

Case No. 2:10-cv-00966-RSM

**STIPULATED ORDER OF
CONTINUANCE OF TRIAL DATE AND
RELATED DATES**

Noted On Motion Calendar:
April 27, 2011

I. STIPULATION

On September 13, 2010, the Court issued its Order Setting Trial Date and Related Dates (the "Order"). Dkt. No. 18. Since then, Plaintiff Microsoft Corporation ("Microsoft") and Defendants Boris Mizhen, Media Network, Inc., New Age Opt-In, Inc., I-Permission, Inc. and Dmitri Kovalsky (collectively "Defendants," and together with Microsoft, the "Parties") have engaged in settlement negotiations and are in the process of reaching final settlement of this matter. To allow sufficient time to reach final settlement, the Parties now respectfully move by stipulation for a two month continuance of the dates set in the Court's September 13, 2010 Order,

STIPULATED ORDER OF CONTINUANCE
OF TRIAL DATE AND RELATED DATES
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beginning with the deadline for dispositive motions.

The Parties propose the following changes to the schedule, subject to the Court's availability:

Event	Current Date	Proposed Date
Trial	July 25, 2011	September 26, 2011
All dispositive motions must be filed by and noted on the motion calendar no later than the fourth Friday thereafter (see CR 7(d))	April 26, 2011	June 27, 2011
Mediation per CR 39.1(c)(3) held no later than	June 10, 2011	August 10, 2011
All motions in limine must be filed by and noted on the motion calendar for the third Friday thereafter pursuant to CR7(d)	June 27, 2011	August 26, 2011
Agreed pretrial order due	July 13, 2011	September 13, 2011
Pretrial conference [to be scheduled by the Court] Trial briefs, proposed voir dire questions, proposed jury instructions, and trial exhibits due	July 20, 2011	September 20, 2011

Now, therefore, by stipulation and for good cause shown, the parties jointly move for a continuance of the dates set in the Court's September 13, 2010 Order as set forth above, beginning with the deadline for dispositive motions.

1 RESPECTFULLY SUBMITTED this 27th day of April, 2011

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II. [PROPOSED] ORDER

Based on the foregoing stipulation, the Court hereby amends its September 13, 2010 Order Setting Trial Date and Related Dates as follows:

Event	Date
Trial	
All dispositive motions must be filed by and noted on the motion calendar no later than the fourth Friday thereafter (see CR 7(d))	
Mediation per CR 39.1(c)(3) held no later than	
All motions in limine must be filed by and noted on the motion calendar for the third Friday thereafter pursuant to CR7(d)	
Agreed pretrial order due	
Pretrial conference [to be scheduled by the Court] Trial briefs, proposed voir dire questions, proposed jury instructions, and trial exhibits due	

Dated this ____ day of _____, 2011.

Honorable Ricardo S. Martinez
United States District Judge